

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

UNITED STATES OF AMERICA)	
)	
v.)	No. 1:21-cr-41-JL
)	
IAN FREEMAN)	
_____)	

ASSENTED-TO MOTION FOR A PRELIMINARY ORDER OF FORFEITURE

The United States of America moves for a Preliminary Order of Forfeiture for the following reasons:

1. The defendant, Ian Freeman, was found guilty after trial of Count Two of a Superseding Indictment that charges him with operation of an unlicensed money transmitting business in violation of 18 U.S.C. § 1960 and Count Twenty-Eight of a Superseding Indictment that charges him with conspiracy to commit money laundering in violation of 18 U.S.C. §1956(h). DN 206.

2. 18 U.S.C. § 982(a)(1) requires that, as part of a defendant's sentence, the court must order the forfeiture to the United States of any property, real or personal, involved in violations of §§ 1956 and 1960, or any property traceable to such property.

3. The following properties are subject to forfeiture under § 982(a)(1) as property involved in the defendant's violations of 18 U.S.C. §§ 1956 and 1960, or as property traceable to such property: (1) (21-FBI-004557) 315.44728106 DASH, seized from Ian Freeman; (2) (21-FBI-005179) \$14,120.00 U.S. Currency seized from Bitcoin ATM (General Bytes BT300470), taken from Bitcoin Embassy; (3) (21-FBI-005180) \$30,980.00 U.S. Currency seized from Campus Convenience Bitcoin ATM]; (4) (21-FBI-005447) One physical '1 BTC' Casascius Bitcoin seized from Ian Freeman's safe; (5) (21-FBI-005449) One physical '100 BTC'

Casascius Bitcoin “gold plated bearer bar” seized from Ian Freeman’s safe; (6) (21-FBI-005718) .9999783 BCH from physical '1 BTC' Casascius Bitcoin seized from Ian Freeman’s safe; (7) (21-FBI-005720) 99.99993098 BCH from physical '100 BTC' Casascius Bitcoin seized from Ian Freeman’s safe; (8) (21-FBI-005519) Misc. coins and ingots of precious metal seized from Ian Freeman’s safe: (A) U.S. \$0.10 silver dime sealed in plastic, (B) OPM sealed 1oz gold bars .999 fine; (C) PAMP sealed 1oz gold bar .999 fine; (D) \$1 Liberty dollar warehouse silver receipts 1/20 oz each; (E) \$5 Liberty dollar warehouse silver receipts 1/4 oz each; (F) \$10 Liberty dollar warehouse silver receipts 1/2 oz each; (G) \$20 Liberty dollar warehouse silver receipts; (H) Silver coins 1/2 oz .999 fine; (I) Silver coins 1 oz .999 fine; (J) Silver coins 2 oz .999 fine; (K) Silver coins in plastic cases 1 oz .999 fine; (L) Silver bullet 1 oz .999 fine; (M) Platinum Ron Paul coin 1 oz .999 fine, (N) OPM sealed 1oz gold bars .999 fine; (O) Australian 1 oz gold coin .999 fine; (P) Australian 2 oz silver coin .999 fine; (Q) Swiss of American 100 oz silver bar .999 fine; and (R) Copper coins; (9) (21-FBI-005553) \$179,672.00 U.S. Currency seized from Ian Freeman’s safe; (10) (22-FBI-006754) 5.24279401 Bitcoin currently restrained in Blockchain Access UK Ltd user account 995c854f-7674-42ec-b465-43373a415ee5, in the name of Ian Freeman; (11) (21-FBI-005555) \$2,124.00 U.S. Currency seized from Ian Freeman’s residence; (12) (21-FBI-005574) \$610.00 U.S. Currency seized from Red Apple Diner (Bitcoin ATM service fees); (13) (21-FBI-005575) \$6,680.00 U.S. Currency seized from Murphy's Taproom Bitcoin ATM; (14) (21-FBI-005583) \$300.00 U.S. Currency seized from Red Arrow Diner Bitcoin ATM; (15) (21-FBI-004556), \$250,497.71 in U.S. Currency in the custody of the United States Marshals Service (16) (21-FBI-005719) \$40,880.95 in U.S. Currency in the custody of the United States Marshals Service; and (17) (21-FBI-005722)

\$587,335.19¹ in U.S. Currency in the custody of the United States Marshals Service.

4. Pursuant to Rule 32.2(b)(2), the United States respectfully requests that this Court enter a Preliminary Order of Forfeiture, forfeiting to the United States: (1) (21-FBI-004557) 315.44728106 DASH, seized from Ian Freeman; (2) (21-FBI-005179) \$14,120.00 U.S. Currency seized from Bitcoin ATM (General Bytes BT300470), taken from Bitcoin Embassy; (3) (21-FBI-005180) \$30,980.00 U.S. Currency seized from Campus Convenience Bitcoin ATM]; (4) (21-FBI-005447) One physical '1 BTC' Casascius Bitcoin seized from Ian Freeman's safe; (5) (21-FBI-005449) One physical '100 BTC' Casascius Bitcoin "gold plated bearer bar" seized from Ian Freeman's safe; (6) (21-FBI-005718) .9999783 BCH from physical '1 BTC' Casascius Bitcoin seized from Ian Freeman's safe; (7) (21-FBI-005720) 99.99993098 BCH from physical '100 BTC' Casascius Bitcoin seized from Ian Freeman's safe; (8) (21-FBI-005519) Misc. coins and ingots of precious metal seized from Ian Freeman's safe: (A) U.S. \$0.10 silver dime sealed in plastic, (B) OPM sealed 1oz gold bars .999 fine; (C) PAMP sealed 1oz gold bar .999 fine; (D) \$1 Liberty dollar warehouse silver receipts 1/20 oz each; (E) \$5 Liberty dollar warehouse silver receipts 1/4 oz each; (F) \$10 Liberty dollar warehouse silver receipts 1/2 oz each; (G) \$20 Liberty dollar warehouse silver receipts; (H) Silver coins 1/2 oz .999 fine; (I) Silver coins 1 oz .999 fine; (J) Silver coins 2 oz .999 fine; (K) Silver coins in plastic cases 1 oz .999 fine; (L) Silver bullet 1 oz .999 fine; (M) Platinum Ron Paul coin 1 oz .999 fine, (N) OPM sealed 1oz gold bars .999 fine; (O) Australian 1 oz gold coin .999 fine; (P) Australian 2 oz silver coin .999 fine; (Q) Swiss of American 100 oz silver bar .999 fine; and (R) Copper coins; (9) (21-FBI-005553) \$179,672.00 U.S. Currency seized from Ian Freeman's safe; (10) (22-FBI-006754) 5.24279401 Bitcoin currently restrained in Blockchain Access UK Ltd user account 995c854f-

¹ This is the amount of funds remaining in the Asset ID # (21-FBI-005722) after \$3,502,708.59 is used to satisfy the defendant's restitution obligations. The Asset ID # otherwise contains \$4,090,043.78.

7674-42ec-b465-43373a415ee5, in the name of Ian Freeman; (11) (21-FBI-005555) \$2,124.00 U.S. Currency seized from Ian Freeman's residence; (12) (21-FBI-005574) \$610.00 U.S. Currency seized from Red Apple Diner (Bitcoin ATM service fees); (13) (21-FBI-005575) \$6,680.00 U.S. Currency seized from Murphy's Taproom Bitcoin ATM; (14) (21-FBI-005583) \$300.00 U.S. Currency seized from Red Arrow Diner Bitcoin ATM; (15) (21-FBI-004556), \$250,497.71 in U.S. Currency in the custody of the United States Marshals Service (16) (21-FBI-005719) \$40,880.95 in U.S. Currency in the custody of the United States Marshals Service; and (17) (21-FBI-005722) \$587,335.19 in U.S. Currency in the custody of the United States Marshals Service, pursuant to 18 U.S.C. § 982(a)(2), and ordering the Federal Bureau of Investigation, or any appropriate federal law enforcement agency, to seize and maintain custody of the forfeited property until further order of the Court.

Richard Guerriero, Esq., and Mark Sisti, Esq., counsel for the defendant, Ian Freeman, assent to the relief sought in this motion.

Respectfully Submitted,

JANE E. YOUNG
United States Attorney

Date: 2/2/24

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